

Debtor 1 Rogelio C. Lorenzo, Jr.

Debtor 2 Leah M. Lorenzo
(Spouse, if filing)

United States Bankruptcy Court for the: Eastern District of Texas
(State)

Case number 14-42375

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: U.S. Bank Trust N.A., et al Court claim no. (if known): 14

Last 4 digits of any number you use to identify the debtor's account: 0 2 7 4

Property address: 1321 Berkley Ct.
Number Street

Plano TX 75023
City State ZIP Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ _____

Part 3: Postpetition Mortgage Payment

Check one:

- ☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: / /
MM / DD / YYYY

- ☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ 2,784.56
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ _____
- c. **Total.** Add lines a and b. (c) \$ 2,784.56

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

01 / 01 / 2020
MM / DD / YYYY

Debtor 1 **Rogelio C. Lorenzo, Jr.** Case number (if known) **14-42375**
First Name Middle Name Last Name

Part 4: Itemized Payment History Attached as Exhibit A

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x /s/ Raymond Valderrama
Signature

Date **02 20 2020**
____/____/____

Print **Raymond Valderrama**
First Name Middle Name Last Name

Title **AVP Bankruptcy**

Company **BSI Financial Services**

If different from the notice address listed on the proof of claim to which this response applies:

Address **7505 Irvine Center Drive**
Number Street
Irvine CA 92618
City State ZIP Code

Contact phone **949 679 6696**
(____) ____-____

Email **bknotices@sns.com**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Response to Notice of Final Cure was served on the 20th day of February, 2020. Said Response was filed electronically. Service was accomplished by the method and to the following as indicated.

By: /s/ Richard Anderson
RICHARD E. ANDERSON
State Bar No. 01209010
4920 Westport Drive
The Colony, Texas 75056
Email: randerson@AndersonVela.com

BY ELECTRONIC NOTICE OR REGULAR FIRST CLASS MAIL, POSTAGE PREPAID:

DEBTOR

Rogelio C. Lorenzo, Jr.
1321 Berkley Ct. (Mailing)
Plano, TX 75023

DEBTOR

Leah M. Lorenzo
1321 Berkley Ct. (Mailing)
Plano, TX 75023

DEBTORS' ATTORNEY

Diane S. Barron
Barron and Carter, LLP
660 N. Central Expy, Ste 101
Plano, TX 75074

TRUSTEE

Carey D. Ebert
PO Box 941166
Plano, TX 75094

U.S. TRUSTEE

US Trustee
110 N. College Avenue, Ste 300
Tyler, TX 75702

CREDITOR ATTORNEY

/s/ Richard E. Anderson
RICHARD E. ANDERSON

BK Case	14-42375	* Prior to 12/2011 payment changes were not required to be filed in courts or with Proof of claim			
BK Filing Date	11/4/2014				
First Post pet date	12/1/2014				
Pmt Change Filed	Filing Date	Effective date	Amount	EXHIBIT A	
POC pmt Filed	2/27/2015	12/1/2014	\$ 1,297.39		
Pmt Change Filed	10/28/2015	12/1/2015	\$ 1,306.28		
Pmt Change Filed	2/9/2016	3/1/2016	\$ 1,394.76		
Pmt Change Filed	2/3/2017	3/1/2017	\$ 1,394.76		
Pmt Change Filed	5/4/2017	6/1/2017	\$ 1,327.07		
Date Rcvd	Amount Rcvd/Rvd		Amount Due	Due Date	Suspense
12/19/2014	\$1,297.39		\$ 1,297.39	12/1/2014	\$ -
1/30/2015	\$1,297.39		\$ 1,297.39	1/1/2015	\$ -
2/2/2015	\$1,297.39		\$ 1,297.39	2/1/2015	\$ -
3/13/2015	\$1,297.39		\$ 1,297.39	3/1/2015	\$ -
4/15/2015	\$1,297.39		\$ 1,297.39	4/1/2015	\$ -
5/28/2015	\$1,297.39		\$ 1,297.39	5/1/2015	\$ -
6/26/2015	\$1,297.39		\$ 1,297.39	6/1/2015	\$ -
8/28/2015	\$1,297.39		\$ 1,297.39	7/1/2015	\$ -
10/9/2015	\$1,297.39		\$ 1,297.39	8/1/2015	\$ -
10/30/2015	\$1,297.39		\$ 1,297.39	9/1/2015	\$ -
10/30/2015	\$1,297.39		\$ 1,297.39	10/1/2015	\$ -
			\$ 1,297.39	11/1/2015	\$ -1,297.39
			\$ 1,306.28	12/1/2015	\$ -2,603.67
			\$ 1,306.28	1/1/2016	\$ -3,909.95
			\$ 1,306.28	2/1/2016	\$ -5,216.23
			\$ 1,394.76	3/1/2016	\$ -6,610.99
			\$ 1,394.76	4/1/2016	\$ -8,005.75
			\$ 1,394.76	5/1/2016	\$ -9,400.51
			\$ 1,394.76	6/1/2016	\$ -10,795.27
			\$ 1,394.76	7/1/2016	\$ -12,190.03
			\$ 1,394.76	8/1/2016	\$ -13,584.79
			\$ 826.00	MFR Fees	\$ -14,410.79
Agreed Order Entered 8/17/16 iao \$15,633.72 to be added to plan. Resume reg pmnt 9/1/16					
9/1/2016	\$1,394.76		\$ 1,394.76	9/1/2016	\$ -
10/3/2016	\$1,394.76		\$ 1,394.76	10/1/2016	\$ -
11/1/2016	\$1,394.76		\$ 1,394.76	11/1/2016	\$ -
12/1/2016	\$1,394.76		\$ 1,394.76	12/1/2016	\$ -
1/13/2017	\$1,394.76		\$ 1,394.76	1/1/2017	\$ -
2/10/2017	\$1,394.76		\$ 1,394.76	2/1/2017	\$ -
3/10/2017	\$1,394.76		\$ 1,394.76	3/1/2017	\$ -
4/14/2017	\$1,394.76		\$ 1,394.76	4/1/2017	\$ -
5/12/2017	\$1,394.76		\$ 1,394.76	5/1/2017	\$ -
6/22/2017	\$1,327.07		\$ 1,327.07	6/1/2017	\$ -
7/12/2017	\$1,327.07		\$ 1,327.07	7/1/2017	\$ -
8/14/2017	\$1,327.07		\$ 1,327.07	8/1/2017	\$ -
9/15/2017	\$1,327.00				\$ 1,327.00
10/10/2017	\$1,327.07		\$ 1,327.07	9/1/2017	\$ 1,327.00
11/10/2017	\$1,327.07		\$ 1,327.07	10/1/2017	\$ 1,327.00
12/12/2017	\$1,327.07		\$ 1,327.07	11/1/2017	\$ 1,327.00
1/17/2018	\$1,327.07		\$ 1,327.07	12/1/2017	\$ 1,327.00
2/16/2018	\$1,327.07		\$ 1,327.07	1/1/2018	\$ 1,327.00
3/15/2018	\$1,327.07		\$ 1,327.07	2/1/2018	\$ 1,327.00
3/21/2018	\$1,327.07		\$ 1,327.07	3/1/2018	\$ 1,327.00

4/13/2018	\$1,327.07		\$ 1,327.07	4/1/2018	\$ 1,327.00	
5/15/2017	\$1,327.07		\$ 1,327.07	5/1/2018	\$ 1,327.00	
6/15/2018	\$1,327.07		\$ 1,327.07	6/1/2018	\$ 1,327.00	
7/16/2018	\$1,327.07		\$ 1,327.07	7/1/2018	\$ 1,327.00	
8/20/2018	\$1,327.07		\$ 1,327.07	8/1/2018	\$ 1,327.00	
9/14/2018	\$1,327.07		\$ 1,327.07	9/1/2018	\$ 1,327.00	
10/23/2018	\$1,327.07		\$ 1,327.07	10/1/2018	\$ 1,327.00	
12/17/2018	\$1,327.07		\$ 1,327.07	11/1/2018	\$ 1,327.00	
1/11/2019	\$1,327.07		\$ 1,327.07	12/1/2018	\$ 1,327.00	
2/14/2019	\$1,327.07		\$ 1,327.07	1/1/2019	\$ 1,327.00	
3/14/2019	\$1,239.03		\$ 1,327.07	2/1/2019	\$ 1,238.96	
4/16/2019	\$1,239.03		\$ 1,327.07	3/1/2019	\$ 1,150.92	
5/20/2019	\$1,239.03		\$ 1,327.07	4/1/2019	\$ 1,062.88	
6/26/2019	\$1,239.03		\$ 1,327.07	5/1/2019	\$ 974.84	Due
7/23/2019	\$1,239.03		\$ 1,327.07	6/1/2019	\$ 886.80	
8/30/2019	\$1,239.03		\$ 1,327.07	7/1/2019	\$ 798.76	
11/22/2019	\$1,239.03		\$ 1,327.07	8/1/2019	\$ 710.72	
12/22/2019	\$1,836.97		\$ 1,327.07	9/1/2019	\$ 1,220.62	
1/21/2020	\$1,351.47		\$ 1,327.07	10/1/2019	\$ 1,245.02	
2/10/2020	\$1,433.09		\$ 1,327.07	11/1/2019	\$ 1,351.04	
			\$ 1,327.07	12/1/2019	\$ 23.97	
PAST DUE PAYMENT			\$ 1,327.07	1/1/2020	\$ -1,303.10	
			\$ 1,327.07	2/1/2020	\$ -2,630.17	
			\$ 1,327.07	3/1/2020	\$ -3,957.24	
			\$ 1,327.07	4/1/2020	\$ -5,284.31	
			\$ 1,327.07	5/1/2020	\$ -6,611.38	
			\$ 1,327.07	6/1/2020	\$ -7,938.45	
			\$ 1,327.07	7/1/2020	\$ -9,265.52	
			\$ 1,327.07	8/1/2020	\$ -10,592.59	